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March 3, 2006

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington DC 20554

**Re: *Ex Parte*  
Petition for Waiver of Section 61.45(d), or in the alternative, Declaratory Ruling  
to Treat End User Common Line Settlement Payments as Exogenous Costs, WC  
Docket No. 05-175**

AT&T Inc. ("AT&T"), on behalf of the Ameritech Operating Companies, Nevada Bell Telephone Company, Pacific Bell Telephone Company, and Southwestern Bell Telephone, L.P., BellSouth Corporation ("BellSouth"), Cincinnati Bell Telephone Company ("Cincinnati Bell"), Qwest Corporation ("Qwest"), Sprint Local Exchange Companies ("Sprint") and Verizon (collectively "Joint Petitioners") submit this *ex parte* in the foregoing docket in response to three inquiries by FCC staff. Specifically, FCC staff has asked the Joint Petitioners to address the following: (1) whether each Petitioner has resolved all end user common line ("EUCL") complaints filed in this matter, (2) what is the earliest month covered by the two-year statute of limitations, and (3) what is the latest period covered by any settlement payments in this matter.

Each Petitioner has resolved all formal and informal EUCL complaints in this matter. Applying the two-year statute of limitations to the informal and formal complaints filed, the earliest month covered by the two-year period is set forth below for each Petitioner.

AT&T:	January 1991 for one formal complaint (complaint filed January 1993); September 1995 for all remaining formal and informal complaints (earliest complaint filed September 1997)
BellSouth:	1991 for one formal complaint (complaint filed in January 1993); September 1995 for all remaining formal and informal complaints (earliest complaint filed September 1997)
Cincinnati Bell:	September 1995 for all formal and informal complaints (earliest complaint received September 1997)
Qwest:	September 1995 for all formal and informal complaints (earliest complaint filed September 1997)

Exparte to Marlene Dortch

Page 2

March 3, 2006

Sprint: September 1995 for all formal and informal complaints (earliest complaint received September 1997)

Verizon: January 1991 (earliest complaint received January 1993)

The latest period covered by this matter is April 15, 1997.

Should you have any questions regarding the foregoing, please contact the undersigned at (202) 326-8903.

Sincerely,

/s/ Davida Grant

Davida Grant

Senior Counsel